

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION**

UNITED STATES OF AMERICA

Plaintiff,

V

Ricardo McHORNE, et al.,

Defendant.

)CASE NO. 00-6311-CR-HUCK

DEFENDANT’S MOTION FOR DISCOVERY
UNDER FED. R. CRIM. P., RULE 16

COMES NOW the Defendant, Ricardo McHORNE, by and through undersigned counsel, and moves this Honorable Court for a formal Order for Discovery by the Defense under and fully in accord with Federal Rule of Criminal Procedure 16.

Defense requests full discovery and inspection of all materials in possession, custody or control of the Government, including but not exclusive to: any statement of the Defendant; Defendant's prior record; any documents or tangible objects; any reports of examinations and tests; list of any expert witnesses to be used under Rules 702, 703, or 705 of the Federal Rules of Evidence.

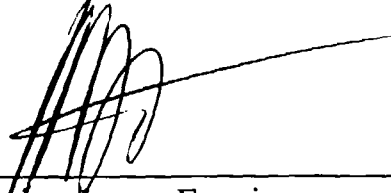
Additionally, any of the above materials that are discovered during the

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process of this case and or trial, they too shall be released to the defense without dely.

The undersigned counsel certifies that he has conferred with Assistant U.S. Attorney MICHAEL DITTO, opposing counsel, in a good faith effort to resolve by agreement the subject matter of this Motion.

Respectfully submitted,

A handwritten signature in black ink, appearing to be 'Guy Spiegelman', written over a horizontal line.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Motion was mailed this February 12, 2001 to the following:

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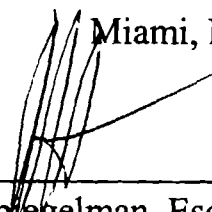
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